

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC.,  
BLAKE ELLMAN, and MARC  
WEINBERG

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, PATRICK J. CALLAHAN,  
in his official capacity as Superintendent  
of the New Jersey State Police, RYAN  
MCNAMEE, in his official capacity as  
Chief of Police of the Chester Police  
Department, and JOSEPH MADDEN, in  
his official capacity as the Chief of Police  
of the Park Ridge Police Department,

Defendants.

Civil Action No. 3:18-cv-10507-PGS-  
JBD

MARK CHEESEMAN, TIMOTHY  
CONNOLLY, and FIREARMS POLICY  
COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, PATRICK J. CALLAHAN,  
in his official capacity as Superintendent  
of the New Jersey State Police,  
CHRISTINE, A. HOFFMAN, in her  
official capacity as Acting Gloucester

Civil Action No. 1:22-cv-04360-PGS-  
JBD

County Prosecutor, and BRADLEY D. BILLHIMER, in his official capacity as Ocean County Prosecutor,

Defendants.

BLAKE ELLMAN, THOMAS R. ROGERS, and ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official capacity as Acting Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police, LT. RYAN MCNAMEE, in his official capacity as Officer in Charge of the Chester Police Department, and KENNETH BROWN, JR., in his official capacity as Chief of the Wall Township Police Department.

Defendants.

Civil Action No. 3:22-cv-04397-PGS-JBD

**NOTICE OF MOTION AND MOTION FOR ADMISSION PRO HAC VICE  
OF RAYMOND M. DiGUISEPPE**

PLEASE TAKE NOTICE, Plaintiffs Firearms Policy Coalition, Inc., Mark Cheeseman, and Timothy Connolly (“Plaintiffs”) hereby move for an Order granting pro hac vice admission to Raymond M. DiGuiseppe, of the DiGuiseppe Law Firm, P.C., Southport, North Carolina, in Civil Action No. 1:22-4360 (RMB)(LHG), as

co-counsel for Plaintiffs in this matter, as previously consolidated with related Civil Actions No. 3:18-10507-PGS-LHG and 3:22-cv-04397-PGS-LHG for purposes of coordinating discovery.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiffs rely upon the Certification of Bradley Lehman with Certified Statements of the foregoing attorney.

PLEASE TAKE FURTHER NOTICE that the Defendants in each of the consolidated cases have advised that they have no objection to the within motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Respectfully submitted,

Dated: May 31, 2023

GELLERT SCALI BUSENKELL &  
BROWN LLC

/s/ Bradley Lehman

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